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ABSTRACT

New York's Special Delinquency Prevention Program (SDPP) was started in 1978 to provide preventive services to youth who most likely might become involved in the juvenile, social services, or mental health systems. In 1987, this program funded 542 community youth programs at a cost of $14 million. This audit assesses the Division for Youth's administration of the SDPP from the allocation of funds to the evaluation of programs. The Legislative Commission on Expenditure Review evaluated the formula used by the division to allocate funds, conducted file reviews of sample 1986 SDPP programs, surveyed county youth bureaus and program providers throughout the state, and interviewed staff. The audit disclosed a need for more consistent implementation of improved management procedures, including application review and oversight of operating contracts, as well as clearer program objectives and better evaluation indicators. Onsite monitoring was the rule upstate, but the exception in New York City. Fiscal controls have improved, due to installation of a computerized fiscal management system. The division has failed, however, to assess the success of the programs in preventing delinquency. Tables are appended showing discretionary funding for project years, region by region, along with results of the assessments of SDPP administration. (TE)

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Special Delinquency Prevention Program

EA 020 375

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SPECIAL DELINQUENCY PREVENTION PROGRAM

SUMMARY AND CONCLUSIONS

Begun in 1978 with a $5 million appropriation, the Special Delinquency Prevention Program (SDPP) was intended to provide preventive services to youth who most likely might become involved in the juvenile, social services or mental health systems. In 1987, this program funded 542 community youth programs at a cost of $14 million.

This audit assesses the Division for Youth's administration of the Special Delinquency Prevention Program from the allocation of funds to the evaluation of programs. The SDPP funds are allocated and administered at both the State and county level. In evaluating the SDPP, LCER staff reviewed the formulas used by DFY to allocate funds; conducted file reviews of sample 1986 SDPP programs; surveyed county youth bureaus and program providers throughout the State; and interviewed staff at DFY, selected county youth bureaus, and the Council on Children and Families.

LCER staff found that the Division for Youth has improved management procedures but has not been sufficiently diligent in implementing them. There is a need to increase application review and oversight of operating contracts. Program objectives and evaluation indicators, required at application, were sometimes inadequate for program assessment. On-site monitoring was the rule upstate, but the exception in New York City. Fiscal controls have improved and a computerized fiscal management system is now in place. Evaluation, however, remains the weakest link in the program. Despite the fact that evaluative indicators are required, the division has failed to assess the effect of these programs. Such an evaluation is critical to determine whether SDPP programs are preventing delinquency.

Background and Program Intent

The Special Delinquency Prevention Program is intended to increase preventive services to "at-risk" youth in communities characterized by high poverty and/or unemployment. Programs must address one of the five priority service areas: alternatives to institutional care, aftercare, education, family support, and work experience and training. SDPP gives local community agencies an opportunity to plan and implement youth programs with up to 100 percent direct funding from DFY.

Begun in 1978, SDPP was unlike any other juvenile delinquency prevention program administered by DFY. For the first time, DFY could select and contract directly with not-for-profit agencies, circumventing the traditional method of funding through the county youth boards. Up to this time, county youth bureaus decided which community agencies would receive funding from all DFY youth programs. In 1979, the Legislature stipulated that one-half of the appropriated monies be distributed to counties outside New York City based on a statewide youth aid formula.

Appropriations

The Special Delinquency Prevention Program is not a statutory program; it is governed by the yearly Appropriations Act. Legislative appropriations for SDPP have grown from $5 million in 1978-79 to $14.6 million in 1986-87. SDPP appropriations can be subdivided into two types of funds:

1. Discretionary. This funding is allocated statewide at the discretion of DFY. These funds are used for direct contracts between DFY and the provider.

2. County. This funding is allocated on a formula basis to all counties outside of New York City. Applications for county funds are submitted to and approved by the local youth bureau subject to final approval by DFY.

The Legislature has fairly evenly divided the SDPP appropriation between discretionary and county funds. In 1986-87, however, $1.9 million (87 percent) of the $2.2 million increase went to the discretionary portion.

Allocations

The SDPP appropriation language necessitates a complicated allocation process. The allocation of SDPP funds is a mixture of formulated State aid, legislative direction, and DFY discretion. DFY allocates the county funds using the comprehensive youth aid formula referenced in the appropriation. Since 1980-81, the Legislature has appropriated an additional county allocation for Erie County.

The Legislature dedicates approximately one-half of the discretionary portion of funds to New York City and Buffalo; the remaining funds are allocated statewide by DFY. In distributing these discretionary funds, DFY uses a formula which has been used by the Division of Criminal Justice Services to distribute federal juvenile justice funds. This formula includes several variables which reflect social conditions linked to delinquency or are direct measures of delinquent behavior to develop an index of county "need."

Although DFY developed a similar formula to distribute funding among New York City boroughs, the actual allocations do not follow the formula. Each year DFY allocates more funds than have been appropriated. The additional funds are based on DFY's estimate of savings or unexpended funds from a prior year's appropriation. In 1987, about $1 million in savings was added to the City's allocation. Without such an allocation of savings, New York City would receive less SDPP funding than it had in prior years (see Appendix A).

Through its designation of certain New York City programs as citywide, DFY has adjusted the distribution of funds among the boroughs. The basic impact of this adjustment in 1987 was to increase funding in Manhattan.

Table S-1 presents data on the 1987 SDPP allocation and, for informational purposes only, compares this allocation to the juvenile justice need index. While New York City receives 67 percent of the discretionary portion of funding, its share of total SDPP funding drops to 40 percent. Thus, when compared to the need index, New York City is the only region of the State which receives a percent allocation less than its need index.

Table S-1

Comparison of 1987 Funding Distribution to Juvenile Justice Need Index

Region	Discretionary	County	Total SDPP Funding Amount	Total SDPP Funding Percent	Juvenile Justice Need Index[a]
Central	$ 377,068	$1,144,438	$ 1,521,506	10.2%	8.6
Eastern	411,427	993,425	1,404,852	9.4	9.3
Metro	544,458	2,057,391	2,601,849	17.4	12.4
New York City	5,996,111	--[b]	5,996,111	40.1	56.6
Western	1,495,533	1,829,495	3,325,028	22.2	13.1
Statewide Projects[c]	122,000	--	122,000	.8	--
Total	$8,946,597	$6,024,750	$14,971,346	100.1%	100.0

[a]This is presented for informational purposes only. The appropriation does not stipulate that funding be distributed according to this or any need index.
[b]Appropriation does not permit county funding to New York City.
[c]Includes funding for two statewide advocacy projects.

Contract Selection

Initial decisions are made by DFY regional staff for the discretionary contracts and by the youth boards for the county contracts. DFY has final approval in all cases, but has chosen to exercise only veto power in the case of county contracts. The application forms are the same. The process favors the renewal program, since new programs must first be invited to apply.

The heart of the application is a five to 15 page semi-structured narrative. In May 1984 DFY issued an effective step-by-step guide to developing a well written proposal. The manual emphasizes the necessity of clearly identifying the problem to be addressed, the objectives to be achieved, and the service methods that will be used to achieve those ends. However, LCER found that DFY staff were not sufficiently diligent in enforcing the application guidelines. As will be pointed out later in this summary, the lack of clear and measurable objectives has impeded effective monitoring and evaluation.

In rating a program's value to the community, one factor to be considered is its consistency with the county comprehensive youth services plan. Yet, over 90 percent of our sample discretionary program applications lacked such information.

In 1987, renewal applicants were rated 50 percent on the past year's monitoring and 50 percent on the application narrative. Thus, a poor monitoring score for the prior year's program could be offset by a good application narrative. New applicants were judged solely on the application narrative. The ratings are not linked to the amount of funds a program will receive, only to selection. In 1987, 542 programs were funded; an additional seven applicants were not selected for funding while an additional 70 were not invited to submit applications.

Monitoring

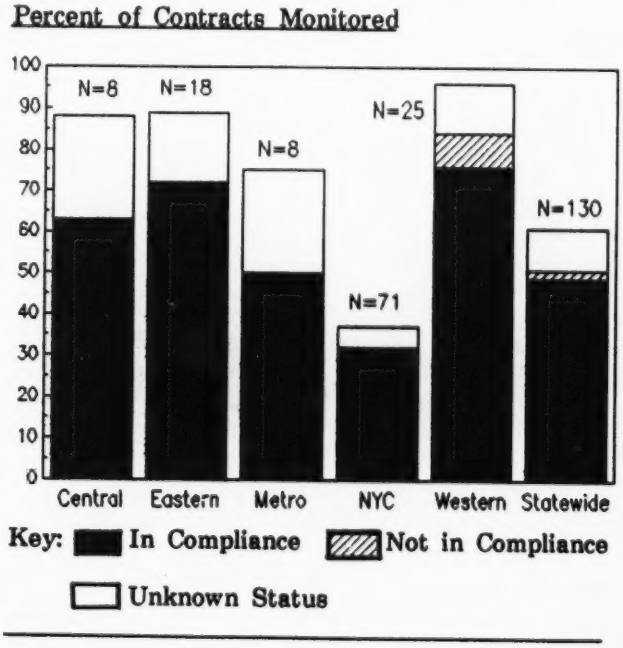
SDPP monitoring requirements varied depending upon whether DFY or the county administered the contract. DFY's guidelines for its direct contracts, require that the provider agency conduct its own monitoring assessment in the first quarter of the contract year. This is followed by a DFY on-site monitoring visit to be completed by July so that the assessment and rating will be available for refunding decisions.

There are no uniform guidelines for county monitoring of SDPP programs. Each county monitors with its own procedures. In the six counties visited, the definitions of monitoring ranged from constant contact with the provider agency and reliance on statistical reporting to more formal monitoring assessments similar in content to DFY's.

Chart S-1 presents data on the extent and status of monitoring for our sample of 1986 discretionary contracts. DFY on-site monitoring reports were found for 61 percent of the sampled programs. The extent of monitoring was very good in regions outside of New York City. However, in New York City where the majority of discretionary projects are located, monitoring was poor. Monitoring reports were missing for almost two-thirds of LCER sample programs in New York City.

Chart S-1

Extent and Status of Monitoring of
LCER Sample of 1986 Discretionary Contracts



Considerable variation existed in the quality of DFY on-site monitoring. DFY guidelines require the monitor to fill in specific contract stipulations, to assess them in accord with DFY instructions, to present findings and to identify the basis for findings. LCER staff found that the consistency and completeness of the monitors' reports deviated from this standard. Instead of contract stipulations, there might be the simple phrase "see contract" or nothing at all. Checkmarks would be used, presumably to indicate compliance, with no basis for the finding. Such incompleteness impaired the usefulness of these documents.

Basic program data such as number of clients served are reported very differently. On the DFY monitoring forms, the target population may be assessed in terms of ethnicity, total number served, or in terms of discrete objectives. Some counties required agencies to report data against each objective, others required demographic data. One county gathered data on the target population served as described in the SDPP regulations, something that DFY does not collect. Such variability in data prevents efforts to compare, uniformly assess and evaluate the impact of these programs.

Upon completion of the on-site visit, the provider agency is supposed to be notified in writing of its compliance or non-compliance with the contract and of any corrective actions that should be taken. In many cases, however, such a letter was not in the file, suggesting that the provider agency was unaware of the results of monitoring. In these cases, LCER staff listed the monitoring status as "unknown." Chart S-2 presents data on the extent to which problems were identified, followed-up and corrected. Note that the base for this chart includes only those monitoring reports with a status of "in compliance" or "not in compliance."

In general, the regions outside of New York City conducted more monitoring, provided more complete reports, and more frequently identified and followed up on problems. However, the majority of DFY's discretionary contracts are located in New York City.

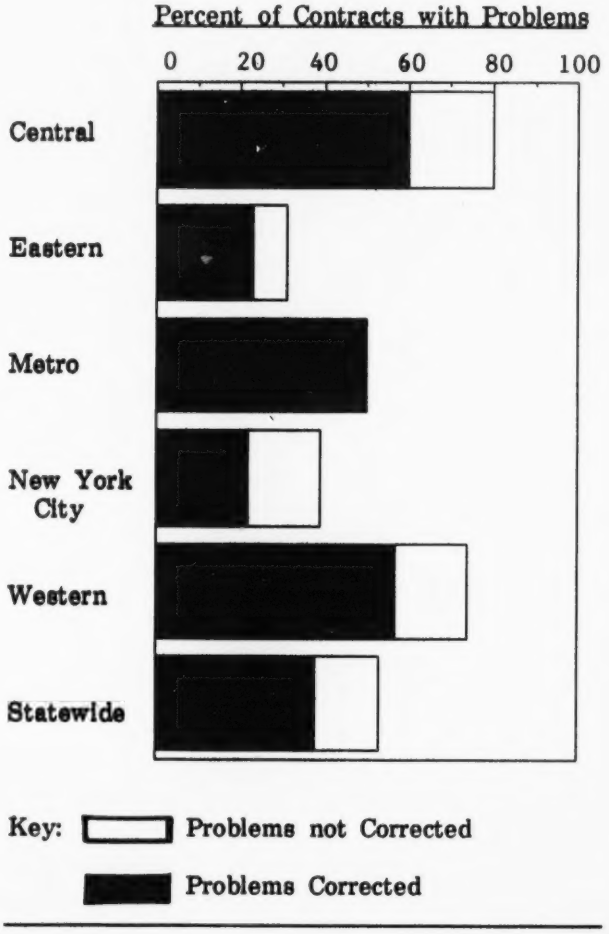
Fiscal Management

SDPP programs receive advance financing from one-quarter to one-third of the total contract amount, depending upon the size of the total grant. Eighty-five percent of LCER's sample discretionary contracts received advances. In the LCER sample of providers, agencies were asked to assess the timeliness of SDPP advance funding as good, fair, or poor. Seventy-seven percent rated it as good. Agencies contracting with the county receive advance funding if the county elects to provide it.

In 1986 a computerized fiscal management system for SDPP was first operational. Providers submit monthly claims vouchers to DFY

Chart S-2

Results of Monitoring
LCER Sample of 1986 Discretionary Contracts



by the 15th of the following month. Claims were generally processed and paid within one month after receipt by DFY's regional office.

In August 1987, DFY published Fiscal Guidelines and Procedures for Direct Contract Programs. However, DFY has not provided similar guidelines for the county contracts.

Evaluation

In any effort to evaluate the effectiveness of prevention programs for youth, it is necessary for there to be explicit objectives upon which the assessment can be made. DFY recognizes this; its application manual clearly states that outcome objectives are to be "clear, realistic and measurable statements describing the intended results or outcomes of the program." Also, the division requires agencies to describe data collection methods and analysis and to provide a sample of its evaluation instruments. But DFY has failed to follow through. LCER sample contracts frequently contained objectives that were not measurable. DFY did not evaluate these contracts; nor did it review evaluative data collected by the agency.

This lack of evaluation plus the variety of program types currently funded suggests that DFY, over the 10-year history of this program, has not yet developed and identified theoretically sound models of delinquency prevention.

Staff Findings and Recommendations for Comment

Chapter 58 of the Laws of 1980 requires heads of audited agencies to report within 180 days of receipt of the final program audit to the Chairman of the Legislative Commission on Expenditure Review and the Chairmen and Ranking Minority Members of the Senate Finance Committee and the Assembly Ways and Means Committee on what steps have been taken in response to findings and conclusions and where no steps were taken, the reasons therefor.

1. The Special Delinquency Prevention Program is not a statutory program, it is governed by the yearly Appropriations Act. The appropriation language requires that the allocation of SDPP funds be a mixture of formulated State youth aid, legislative direction, and DFY discretion. (See pp. 2, 3.)

2. DFY states that its discretionary funds are distributed on the basis of "need" formulas. LCER found, however, that DFY can and does adjust these funds by (1) allocating funds regionally, (2) using prior year's unexpended funds, and (3) designating citywide programs. The impact of these adjustments has been to increase funding to New York City, particularly in the borough of Manhattan. (See pp. 9-13.)

3. DFY instituted improved procedures for application review but has not diligently implemented them. **DFY should insure that program objectives and evaluation indicators are adequate for program assessment. Since the majority of SDPP contracts are renewals and the application process is paperwork intensive and takes about four months, DFY might wish to consider converting to a multi-year application process.** (See pp. 13-15.)

4. On-site monitoring of SDPP programs by DFY was very good in regions outside of New York City. However, in New York City where the majority of discretionary projects are located, monitoring reports were missing for almost two-thirds of LCER sample programs. **The extent and quality of monitoring needs to be improved, especially in New York City.** (See pp. 16-18.)

5. SDPP fiscal controls have improved and a computerized fiscal management system is now in place. (See pp. 19, 20.)

6. DFY has not evaluated SDPP programs despite the fact that evaluative indicators are required at application. **DFY should not only evaluate existing programs but should also promote effective models of delinquency prevention.** (See p. 21.)

7. **The Legislature may wish to consider requiring that DFY evaluate SDPP programs.**

GLOSSARY

County Comprehensive Plan: Section 420 of the Executive Law was revised in 1974 to provide financial incentives for counties to undertake comprehensive youth services planning. It was intended that increased coordination and planning at the county level would result in more effective and efficient program allocations and avoid duplication of services within the county. The counties submit to DFY three-year county plans prioritizing their county youth needs and indicating the programs which they are funding to address these needs.

SDPP County Funds: County or Type A funding is allocated on a formula basis to all counties outside of New York City. Since 1980-81, an additional allocation has been approved for Erie County. Applications for county funds are submitted to and approved by the local youth bureau subject to final approval by DFY.

SDPP Discretionary Funds: Discretionary or Type B funding is allocated statewide at the discretion of DFY. These funds are used for direct contracts between DFY and the provider to support innovative needed programs which may not be funded otherwise. Applications for discretionary funds are submitted to DFY directly. The Legislature dedicates a portion of these discretionary funds to Buffalo and New York City while the remaining funds are available for statewide allocation.

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FOREWORD

The Legislative Commission on Expenditure Review was established by Chapter 176 of the Laws of 1969 as a permanent agency for among other duties, "the purpose of determining whether any such department or agency has efficiently and effectively expended funds appropriated by the Legislature for specific programs and whether such departments or agencies have failed to fulfill the legislative intent, purpose and authorization." This program audit, Special Delinquency Prevention Program Audit is the one hundred seventy-second staff report.

The Special Delinquency Prevention Program was designed to provide preventive services to youth who might likely become involved in the criminal justice, social services or mental health systems. The Division for Youth (DFY) administers the program by contracting with local community providers.

Although DFY is credited with the steps it has taken to improve program and fiscal accountability, evaluation still remains an area of serious deficiency. The audit finds that DFY approves and renews contracts without assessing the effectiveness of these programs in preventing delinquency. To address this, the audit recommends that DFY (1) streamline its application process insuring that program objectives and evaluation indicators are adequate for program assessment; (2) improve the monitoring of New York City programs; (3) evaluate existing programs; and, (4) promote effective models of delinquency prevention.

Appreciation is expressed to personnel of New York State Division for Youth, the County Youth Boards and the program operating agencies for their assistance and cooperation during the audit.

The audit was conducted by Karen McNamara, Chairwoman, Nancy Perry, Steven Alviene, Randi Michelman, and Christopher Wieda. Stuart Graham supervised quality control. Word processing and graphics services were performed by Dawn Hewitt and Marilyn Kroms. Overall supervision was the responsibility of the Acting Director.

The Commission is interested in hearing from the readers of its audits. Any comments or suggestions should be sent to the Acting Director at the address listed on the inside cover of this audit.

The law mandates that the Chairmanship of the Legislative Commission on Expenditure Review alternate in successive years between the Chairman, Senate Finance Committee, and the Chairman, Assembly Ways and Means Committee. Assemblyman Saul Weprin is Chairman for 1988 and Senator John J. Marchi is Vice Chairman.

May 20, 1988

James J. Haag
Acting Director

I PROGRAM OVERVIEW

The Special Delinquency Prevention Program is one of several programs operated by the Division for Youth to prevent and control juvenile delinquency. Other Division For Youth programs directed to this objective include Youth Development and Delinquency Prevention, Youth Initiatives, and Runaway and Homeless Youth programs. This chapter discusses the background and intent of the Special Delinquency Prevention Program and describes its administration and finances.

Background and Program Intent

In the late 1970's the Legislature, concerned about the the rise in violent juvenile crime, created the Special Delinquency Prevention Program (SDPP) to provide increased preventive services to youth who most likely might become involved in the juvenile justice, social services or mental health systems.

SDPP began in 1978 as a $5 million appropriation to finance

> services and expenses, including contractual services, to establish and implement a youth delinquency and development program...to insure prevention of delinquency in young adults.[1]

SDPP gave local community agencies an opportunity to plan and implement youth programs with up to 100 percent direct funding from the Division for Youth (DFY). It was unlike any other juvenile delinquency prevention program administered by the division. For the first time, DFY could select and contract directly with not-for-profit agencies, circumventing the traditional method of funding through the county youth bureaus. Up to this time, county youth bureaus had decided which community agencies would receive funding from all DFY youth programs.

This situation was partially changed in 1979 when the Legislature allowed counties outside of New York City to become involved in the SDPP. The Legislature stipulated that one-half of the appropriated monies be distributed to counties outside New York City based on a statewide allocation formula determined by each county's eligibility for comprehensive planning funds under Section 420 of the Executive Law. Section 420 details State aid provisions for youth programs and provides financial incentives for counties to plan comprehensive youth services. Increased coordination and planning at the county level was intended to stimulate more effective and efficient program allocations and avoid duplication of services within the county.

SDPP Criteria

The key features of the Special Delinquency Prevention Program are the involvement of community-based organizations and service to "at-risk" youth in communities characterized by high delinquency and/or unemployment.

The regulations list 15 categories of targeted youth, some more definitively identified than others. For example, included are those under 21 who are involved in one or more of the following situations:

--Considered for a PINS or juvenile delinquency petition;

--Discharged into the community from institutional care or on parole;

--School dropouts;

--Members of a family that has had frequent involvement in the criminal justice and/or human services systems or that lacks adequate family support;

--Having limited English speaking abilities;

--Needing employment support services and jobs.

On the application, the youths are identified primarily by the geographical area in which they live. Applicant community agencies indicate whether the youth to be served are delinquent, potentially delinquent, or general youth of the area. In most cases, the providers indicate that they are serving a mix of these types.

To meet the needs of these youth, programs must address at least one of the major service priority areas: (1) alternatives to institutional care, (2) aftercare, (3) education, (4) family support, and (5) work experience and training.

SDPP Appropriations

The yearly Appropriations Act governs the Special Delinquency Prevention Program. Legislative appropriations for SDPP have grown from $5 million to $14.6 million in 1986-87 (see Table 1). The appropriations are subdivided into two types of funds:

Discretionary. Discretionary or Type B funding is allocated statewide at the discretion of DFY. These funds are used for direct contracts between DFY and the provider to "support innovative needed programs...which may not be funded otherwise."[2] Applications for discretionary funds are submitted to DFY directly and do not require county youth bureau approval. The Legislature dedicates a portion of these discretionary funds to Buffalo and New York City while the remaining funds are available for statewide allocation. DFY's allocation of these funds will be discussed in Chapter II.

County. County or Type A funding is allocated on a formula basis to all counties outside of New York City. Since 1980-81, an additional allocation has been approved for Erie County. Applications for county funds are submitted to and approved by the local youth bureau subject to final approval by DFY.

The Legislature has fairly evenly divided the SDPP appropriation between discretionary and county funds. In 1986-87, however, $1.9 million (87 percent) of the $2.2 million increase went to the discretionary portion.

Table 1

Division for Youth
Special Delinquency Prevention Program
1978-79 to 1986-87 Appropriations

Year	County	Discretionary	Administration[a]	Total
1978-79	--	$5,000,000[b]	--	$ 5,000,000
1979-80	$3,500,000	3,500,000	--	7,000,000
1980-81	6,500,000	6,500,000	--	13,000,000
1981-82	6,500,000	6,500,000	--	13,000,000
1982-83	5,992,550	6,992,450	--	12,985,000
1983-84	5,992,550	6,492,450	--	12,485,000
1984-85	5,992,550	6,492,450	--	12,485,000
1985-86	5,732,550	6,012,450	$640,000	12,385,000
1986-87	6,021,000	7,889,000	640,000	14,550,000

[a]The "administration" column includes monies for auditing, insurance and bonding for the special delinquency programs. These monies previously had been integrated into the two SDPP line items.
[b]The first SDPP appropriation was placed under "Miscellaneous for all State Agencies."

Source: Appropriation Acts 1978-79 to 1986-87.

Table 2 presents data on the 1987 allocation, both discretionary and county, by DFY region and compares this distribution to the need as defined in the juvenile justice formula. The formula, developed by the Division of Criminal Justice Services and the State Council on Children and Families, uses several variables which reflect social conditions linked to delinquency or are direct measures of delinquent behavior to develop an index of need. As shown, there is variation between "need" as defined by the juvenile justice formula and the actual SDPP allocation. All regions of the State, except New York City, receive SDPP aid equal to or greater than the percent of "need" indicated by the formula. A further comparison of allocation to need by county indicated considerable variation within region. This information is presented for comparative purposes only. The appropriation governing SDPP does not require that SDPP aid be related to "need" as defined by the juvenile justice or any other formula.

Table 2

Comparison of 1987 Funding Distribution to Juvenile Justice Need Index

Region	Discretionary	County	Total SDPP Funding Amount	Total SDPP Funding Percent	Juvenile Justice Need Index[a]
Central	$377,068	$1,144,438	$1,521,506	10.2	8.6
Eastern	411,427	993,425	1,404,852	9.4	9.3
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Western	1,495,533	1,829,495	3,325,028	22.2	13.1
Statewide Projects[c]	122,000	--	122,000	.8	--
Total	$8,946,597	$6,024,750	$14,971,346	100.1	100.0

[a]This is presented for comparative purposes only. The appropriation does not stipulate that funding be distributed according to this or any need index.
[b]Appropriation does not permit county funding to New York City.
[c]Includes funding for two statewide advocacy projects.

Source: Developed by LCER Staff from information provided by the Division for Youth, February 1987 and NYS Council on Children and Families, Juvenile Justice Formula: 1985.

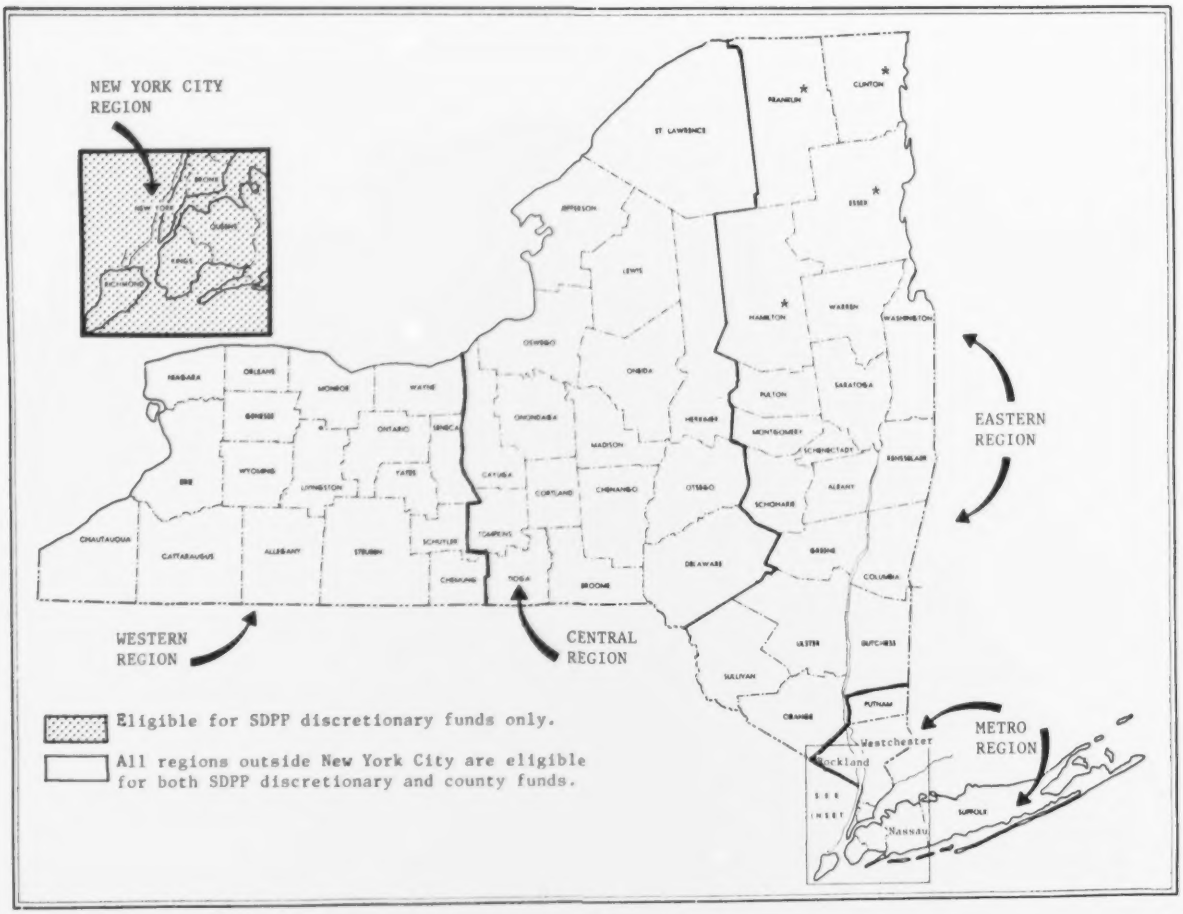
While these lines of administration are generally true, there are some exceptions. In some cases, a DFY direct contract may be administered indirectly by the county or a county contract administered directly by DFY.

SDPP Program Administration

The Local Services Office within the Division for Youth is responsible for the administration of SDPP. The discretionary contracts are administered directly by DFY through their five regional offices and associated field offices. The five DFY regions are shown on the map. The program management specialists that handle SDPP contracts are the same ones that handle other DFY programs for the region.

In the case of the county funds, DFY has a contract with the county youth bureau for the total amount of county funds. The youth bureau, in turn, is responsible for administering the individual program contracts by providing technical assistance, monitoring and evaluation.

DFY Regions
1987


NEW YORK CITY REGION
EASTERN REGION
WESTERN REGION
CENTRAL REGION
METRO REGION
Eligible for SDPP discretionary funds only.
All regions outside New York City are eligible for both SDPP discretionary and county funds.

Differences between SDPP Programs

Table 3 shows, by type of SDPP funding, the major program areas funded in 1986. Most discretionary funded programs were in education, mental health, and employment while most county funded programs were in the mental health, family support, and education areas. Despite a DFY guideline that discretionary funds are not to be used for recreation projects, two programs cite recreation as their major activity. Additionally, three discretionary funded programs cite administration as the primary activity.

Many programs addressed more than one major program area and it could not be discerned from program descriptions that discretionary funds were supporting innovative projects that would not be funded otherwise, as called for in DFY's Regulations. Indeed, some agencies received both county and discretionary funds.

Table 3

1986 SDPP Programs
by Major Program Area and Type of Funds

	Type of SDPP Funding			
	Discretionary-Funded		County-Funded	
Major Program Area	Number of Programs	Amount Approved	Number of Programs	Amount Approved
Administration	3	$129,376.00	24	$374,406.00
Basic Needs	7	253,930.00	14	214,844.85
Education	64	2,173,948.24	49	848,554.20
Employment	41	1,818,672.08	38	862,087.87
Family Support	24	762,897.00	52	965,741.60
Health	6	150,500.00	10	128,938.00
Juvenile Justice	22	666,460.30	29	541,397.82
Legal Services	4	84,569.00	7	88,416.41
Mental Health	48	1,414,338.60	90	1,688,414.30
Recreation	2	24,000.00	2	32,777.00
Total	221	$7,478,681.22	315	$5,745,578.05

Source: Division for Youth, December 1987.

Exhibit I summarizes the differences between the two types of SDPP programs. The primary distinctions are (1) the method and distribution of funds and (2) program management. DFY and county staff were asked to comment on the advantages and disadvantages of the SDPP program in which the allocation of funds and the administration of contracts is done at both the State and county level. The primary advantage, cited by both DFY and some counties, is that it provides for a mix of county "home rule" and State direction. Thus, for example, DFY could fund programs which some county legislatures might not be willing to approve such as teenage pregnancy prevention. On the other hand, some counties felt that this duality of funding defeated the concept of county comprehensive youth services planning. SDPP application forms inquire which county comprehensive priority the program will address; yet fewer than 10 percent of the applications LCER reviewed contained that information. The counties do not have input into the selection of the DFY-funded programs; counties are notified of DFY funding only after the programs have been selected. Another disadvantage has been the lack of uniform program administration. As will be discussed in Chapter III, DFY has established uniform procedures for administering its direct, discretionary programs but has not extended them to the county programs. DFY and the various counties use different reporting, monitoring and evaluation instruments. As a result there is no common measure for assessing the effectiveness of similar prevention programs.

Exhibit I

Types of SDPP Programs

Characteristic	SDPP Discretionary	SDPP County
Funding	Appropriation stipulates that about one-half of these funds be distributed to New York City and Buffalo, while the remaining funds are distributed statewide at the discretion of DFY.	Funds are allocated to counties outside New York City based on a per capita comprehensive youth aid formula. (Appropriation does not permit the allocation of county funds to New York City.)
Target Population	Regulations list 15 categories of "at risk" youth.	Same
Eligible Applicants	Not-for-profit, community-based agencies.	Same
Eligible Services	Programs addressing alternatives to institutional care, aftercare, education, family support, work experience, training, and advocacy projects.	Same, except for advocacy projects.
Program Management	DFY selects and contracts directly with program provider. Contracts are directly administered by DFY staff.	DFY indirect contracts through the county youth boards. County youth board selects and approves programs subject to final approval by DFY. Contracts are administered by the county youth bureau.

Audit Scope and Methods

This audit reviews the administration of the SDPP program from the allocation of funds through the selection, monitoring, reporting and evaluation of contracts. LCER staff conducted file reviews of sample 1986 SDPP programs. Samples were drawn of 130 DFY direct discretionary programs and 30 county programs. The sample of DFY discretionary programs reflects the statewide distribution of such programs and includes programs from each of the five DFY regions. It is statistically valid with a confidence level of 90 percent +/-5. The county sample was selected from the six largest upstate counties (Erie, Monroe, Nassau, Onondaga, and Westchester) which accounted for about 55 percent of 1986 SDPP county funding. The programs within each of those counties represent more than

half of the SDPP county funding within that county. The data collection was supplemented with interviews at DFY central and regional offices, selected county youth bureaus, and the Council on Children and Families. LCER also surveyed county youth bureaus outside of New York City and sample program providers throughout the State.

Chapter Summary

● The Special Delinquency Prevention Program (SDPP) is intended to provide increased preventive services to "at-risk" youth in communities characterized by high poverty and/or unemployment. It is aimed at keeping youth from becoming involved in or dependent upon the juvenile justice, mental health or human services systems.

● Originally established as a program of direct State aid to community organizations, SDPP funds circumvented the traditional system of allocating funds through the county youth boards. Since 1979, however, the SDPP appropriation has been subdivided into two types. Approximately one-half of the funds are distributed through county youth boards outside of New York City according to a comprehensive youth aid formula. The remaining funds are allocated directly by DFY.

● The advantage of allocating funds at both the State and county level is that it provides a mix of "home rule" and State direction. The disadvantage is that, if not coordinated, it can result in a lack of program uniformity.

● Comparing 1987 SDPP allocations to regional percentages of "need," all regions of the State, except New York City, were found to receive SDPP aid equal to or greater than their percent of "need."

II ALLOCATIONS AND CONTRACT SELECTION

About one-half of the total SDPP funding is distributed at the discretion of DFY. This chapter reviews the formulas and procedures used by DFY in distributing these funds and also assesses the SDPP contract selection process.

SDPP Discretionary Allocations

The SDPP appropriation stipulates that about half of the discretionary monies be targeted to New York City and Buffalo, with the remaining amount to be distributed statewide. The sharing of the targeted funds between New York City and Buffalo is not set in law, however. According to DFY, the distribution of targeted funds has historically been 72-28 percent split with 72 percent of the funds going to New York City. For the 1987 project year DFY raised the percentage of targeted funds given to New York City to 73 percent.

In apportioning the remaining portion of funds across the State, DFY uses a formula developed by the Division of Criminal Justice Services. A second formula, developed by DFY is then used to distribute funding among the New York City boroughs.

Statewide Distribution

DFY began using the juvenile justice formula for distributing SDPP funds in the early 1980's. It was developed by the Division of Criminal Justice Services and the State Council on Children and Families for the disbursal of federal juvenile justice funds. The formula, updated in 1983, uses seven variables which reflect social conditions linked to delinquency or are direct measures of delinquent behavior. DFY's use of this formula seems reasonable since a number of variables target the "at-risk" groups defined in the SDPP regulations. Included among the variables are:

--Percent of high school students that dropped out during the 1982-83 school year;
--Percent of students failing the 1983 sixth grade reading test;
--Percent of Persons in Need of Supervision (PINS) petitions filed; and
--Arrest data on persons ages seven to 19.

Although the need is determined on a county basis, DFY (and also DCJS) distribute the funding on a multi-county regional basis. DFY totals the individual county scores to determine a percent of regional need. This results in the following statewide distribution:

Region	Juvenile Justice Formula Percent of Need
Central	8.6%
Eastern	9.3
Metro	12.4
New York City	56.6
Western	13.1
Total	100.0%

By totalling county percentages into an overall regional percentage, DFY has greater flexibility in allocating funds and a given county may receive more or less than its actual need percentage. In the three upstate regions, not all counties participate in discretionary funding, i.e., either a provider agency did not apply or was not accepted for discretionary funding. In the Metro region where all counties participate, DFY's flexibility in allocating funds resulted in inequity between the percent of need as derived from the formula and the percent of funding actually allocated by DFY:

Metro Region	Juvenile Justice Percent of Need[a]	1987 Allocation % Distribution[b]
Nassau	24.4%	23.4%
Putnam	2.2	9.4
Rockland	6.9	12.9
Suffolk	42.3	43.8
Westchester	23.9	10.5
Metro Region Total	99.7%	100.0%

[a]County and regional percentages were converted to total 100 percent.
[b]Based on approved commitments as of December 30, 1986 representing 78% of the total Metro allocation.

Table 4 shows the statewide distribution of discretionary funds for program year 1987. It should be noted, however, that all counties outside of New York City also receive SDPP county funds.

New York City Distribution

Since some variables used to develop the juvenile justice need percentages are not collected and reported at the borough level, DFY developed its own formula for distributing funds within New York City. The City formula was derived from 1980 census data and differed from the juvenile justice formula since it did not include the more specific criminal and juvenile justice indicators cited previously. The variables used in the New York City formula are:

--Percent of single-headed households with children,
--The 1979 high school dropout rate,
--Percent of households receiving public assistance,
--Percent of families with income below the poverty level, and
--Percent of labor force unemployed.

LCER staff asked DCJS and the Council on Children and Families personnel responsible for the development of the juvenile justice formula to comment on the variables used in the New York City formula. While neither could comment on the impact of these different formulas, both did note that the juvenile justice formula targets "youth at risk" and characterized the variables used by DFY as more general indicators of "families in chaos." According to DFY staff, all such indicators of need would result in very little deviation but hard data were not available to support their assessment.

Table 4

Regional Distribution of SDPP Discretionary Funding for Project Year 1987

Region	Formula Need Percent Distribution	1986-87 Appropriation Formulated[a]	1986-87 Appropriation Targeted[b]	Prior Years' Savings	Total Funds Available	Total Funds Percent Distribution
Central	8.6%	$377,068	--	--	$377,068	4.3%
Eastern	9.3	411,427	--	--	411,427	4.7
Metro	12.4	544,458	--	--	544,458	6.2
New York City	56.6	2,494,111	$2,444,403	$1,057,597	5,996,111	67.9
Western	13.1	577,936	917,597	--	1,495,533	16.9
Subtotal	100.0%	4,405,000			8,824,597	100.0%
Statewide Projects		122,000			122,000	
Total		$4,527,000	$3,362,000	$1,057,597	$8,946,597	

[a]Appropriation requires that these funds be distributed statewide: $4,405,000 of these funds were distributed regionally according to the Juvenile Justice Formula; $122,000 funded two statewide projects.
[b]Appropriation requires that these funds be distributed to cities with populations greater than 350,000 (i.e., New York City and Buffalo).

Source: Developed by LCER staff from information provided by the Division for Youth, February 1987.

LCER found, however, that distribution within New York City has not been according to formula. The City's distribution has been altered by DFY's use of prior years' savings and its designation of "citywide" programs.

Prior Year's Savings. Each year, DFY rolls over unexpended balance of SDPP funds into the next fiscal year. This allows for additional programming beyond the yearly appropriation. The estimation of program savings requires that DFY have accurate and timely information on appropriations, awards and claims. Until recently, there was no SDPP computerized financial management information system. Savings estimates were rough calculations that the program would spend about what it had the prior year. In 1985, DFY developed a computerized financial management system for SDPP and established tighter fiscal controls including an end date by which claims must be submitted.

In determining the allocation for the 1987 year, DFY estimated a $1.1 million savings from the 1984-85 appropriation. This estimate was then added to the appropriation making up the total amount of funds to be allocated in 1985-86. Savings for the last three years have approximated $1 million each year.

No formula governs the distribution of these savings. In 1986, about $1 million in savings were applied to the discretionary portion, an additional one-time savings of $500,000 was applied directly to New York City, and $50,000 was applied to the county portion of SDPP funds. For the 1987 project year, DFY applied $1.1 million in savings to the targeted portion (New York City and Buffalo) portion of the appropriation and a very small amount of funds to maintain Hamilton County at a basic level of funding. LCER's analysis of 1987 allocations shows that these targeted savings were applied only to New York City and that this allocation of savings has kept the City at its prior level of funding.

Citywide Programs. For the 1987 project year DFY added a new dimension to the distribution of funds among the boroughs with the designation of "citywide" programs. DFY noted that:

> the 1986 SDPP allocation for Manhattan imposed a critical reduction in available funding for that borough. Community groups raised a significant, and we believe legitimate, concern that some agencies based in Manhattan were in large measure serving youth from other boroughs. As such, census derived allocations for Manhattan did not reflect a realistic picture of the needs to be addressed within this borough.[1]

As a solution, DFY developed five criteria for the designation of "citywide" programs:

1. At least half of the youth served by the program come from boroughs other than the borough in which the program site is physically located.

2. The program responds to a need that is recognized to exist throughout the entire city.

3. The program responds to a targeted need or population not currently being served by existing programs.

4. The program has multi-borough sites or a mobile component.

5. The program has a solid record of at least three years of service.[2]

According to DFY, each program in the "citywide" category would not necessarily have to satisfy all of the above criteria. This is important since only the first and perhaps the fourth criteria indicate that a program is actually serving a target population outside its own borough. Indeed, an examination of the 39 projects designated as "citywide" in 1987 showed that only 11 projects met the first criterion, i.e., that the program served youth outside its own borough. Five projects had multi-borough sites or a mobile component.

There were no citywide projects in Staten Island. The remaining four boroughs had 39 "citywide" projects totalling $1.7 million. This designation of "citywide" projects resulted in increased funding for Manhattan of $1.2 million.

Table 5 compares possible methods of allocation to the actual allocations made by DFY for the 1987 project year. The first column shows borough distribution had the DFY formula been applied to New York City's total allocation. The next option shows the distribution had the "citywide" funds been determined and the remaining funds been distributed by DFY formula. It is apparent that neither of these factors fully explain how DFY allocated funds within New York City. The impact of the adjustments within New

York City has been to increase funding in Manhattan and to slightly decrease funding in the remaining boroughs.

In summary, DFY claims that its discretionary funding is being distributed on the basis of "need formulas." In reality, however, DFY can and does adjust the allocation of these discretionary funds through (1) the process of allocating funds regionally, (2) its use of "savings", and (3) its designation of "citywide" programs.

Table 5

SDPP Discretionary Funding
Possible Versus Actual New York City Allocations
for Project Year 1987

	DFY Formula Applied To					
	Total NYC Allocation		Total NYC Allocation Adjusted for Citywide		Actual Allocation	
New York City	Amount	Percent	Amount	Percent	Amount	Percent
Bronx	$1,415,082	23.6%	$1,164,611	19.4%	$1,077,302	18.0%
Brooklyn	2,218,561	37.0	1,688,366	28.2	1,958.785	32.7
Manhattan	1,151,253	19.2	2,064,350	34.4	2,037,926	34.0
Queens	1,067,308	17.8	976,112	16.3	812,542	13.5
Staten Island	43,907	2.4	102,672	1.7	109,556	1.8
Total	$5,996,111	100.0%	$5,996,111	100.0%	$5,996,111	100.0%

Source: Developed by LCER staff from information provided by the Division for Youth, January 1987.

Contract Selection

Initial contract selections are made by DFY regional and field staff for the discretionary programs and by the county youth boards for the county programs. DFY has final approval over both types of programs, but has chosen to exercise only veto power in the case of the county programs.

Application Process

The application form and process is basically the same for all of SDPP. For new programs, agencies must submit a brief concept paper. If the concept is approved, the agency is invited to submit an application. There is no request for proposals, only an application process. Most of the programs each year are renewals.

The heart of the application is a semi-structured five to 15 page narrative detailing the need or problem being addressed, geographic area to be served, program objectives, service methods, agency organization, information on evaluation, monitoring, finances and staffing.

In May 1984 DFY issued a Manual for the Preparation of the Program Proposal Narrative. This manual provides an effective step-by-step guide to developing a well-written proposal. It emphasizes the necessity of clearly identifying the problem to be addressed, the objectives to be achieved, and the service methods that will be used to achieve those ends.

Instructions clearly differentiate between process as opposed to outcome objectives. Statements about how many will be served and the number and nature of the activities are process and relate to service methods while objectives should measure change or results. In sample contracts, we found that both types of objectives were listed, suggesting that DFY staff were not sufficiently diligent in enforcing the application guidelines. The distinction is necessary because it relates to how the program can be effectively monitored and evaluated.

Applicant Ratings

In the case of the discretionary contracts, DFY regional staff rate and select the applicants according to the criteria outlined in the DFY SDPP-B rating instrument.

In rating the application, each of nine sections is assigned a numerical rating of zero to three (poor, fair, good, or excellent). In rating a program's value to the community, one factor to be considered is its consistency with the County Comprehensive Plan. There is a space on the application in which to indicate the County Comprehensive Plan priority number. The lack of such a priority number in over 90 percent of sample discretionary programs suggests that DFY may not be aware of a program's consistency with comprehensive planning.

In 1987, new programs were rated solely on application narrative while renewal programs were rated 50 percent on monitoring and 50 percent on application narrative. A renewal program which receives a poor monitoring rating could be offset by a higher narrative score. The programs are ranked in terms of total score. Scores are rolled up for both new and renewal programs and are ranked within region. Thus, a new program with a total score of 100 would be ranked ahead of a renewal score of 80 within a region.

In examining the 1987 rankings, LCER noted that the overall scores for five of the seven programs that were not selected were lower than those for selected programs. There were two exceptions. In the Western Region, a new program with a rating of 63 was not selected while a renewal program with a rating of 61 was funded. In the Central Region, a new program scoring 96 was not selected but was funded as part of another contract.

The utility of DFY's rating system can justifiably be questioned since (1) DFY has a procedure for limiting applications when it requires that new programs must be invited to submit an application; (2) the ratings are not linked to the amount of funding solely to selection; (3) very few new programs are funded every year; (4) a poor monitoring rating can be offset by a good application narrative; and (5) the lack of monitoring reports for a number of LCER's sample programs in New York City (see Chapter III) brings the monitoring rating as a whole into question.

In 1987, 542 programs were funded; seven applicants were not selected for funding while 70 were not invited to submit applications.

Length of Time to Process Contract

For 125 of the 130 direct contracts sampled, the average length of time to process an application from agency submission to Comptroller's signature was 120 days or four months. There was an average of 82 days between agency submission and the DFY Director's signature. This corresponds with one agency's assessment that applications must be in six months before contract year and final notification is not made until one month before contract begins. Some of the sample discretionary contracts were not approved until after the contract year had already begun.

The amount of paperwork to be processed was a concern of some regional staff, counties and providers. One regional office's officials suggested that DFY consider adopting a multi-year application similar to that used by some federal and State government programs.

One other concern raised by several sample respondents was that the 1986 carbonless application forms did not allow for easy corrections. Since DFY did not allow for corrections on the forms, some agencies cited this as a problem and reason for delay.

Chapter Summary

●Despite DFY claims that discretionary aid is distributed based on need formulas, LCER found that DFY does have flexibility in allocation of these discretionary monies. This flexibility is attributed to: (1) DFY's decision to allocate funds on a regional basis; (2) its designation of "citywide" programs; and (3) its use of prior years' savings.

●DFY's application guidelines have not been adequately enforced. The lack of clear and measurable objectives has impeded effective monitoring and evaluation.

●The utility of DFY's applicant rating system can be questioned since: (1) DFY has a procedure for limiting applications when it requires that new programs must be invited to submit an application; (2) the ratings are not linked to the amount of funding, solely to selection; (3) very few new programs are funded every year; and (4) a poor monitoring rating can be offset by a good application narrative.

●For LCER's sample discretionary contracts, the average length of time to process an application was four months.

III MONITORING, REPORTING AND EVALUATION

Since 1984 DFY has published SDPP program guidelines, promulgated Rules and Regulations, and implemented monitoring standards. This chapter reviews SDPP requirements and reviews their impact on a sample of 1986 programs. Assessments of DFY's administration of SDPP by county youth boards and sample providers are also presented.

Monitoring

Monitoring requirements vary depending upon whether DFY or the county administers the contract. Of the 417 SDPP contracts outside of New York City, seven percent are "cross-administered." That is, a contract which has been funded by DFY directly may be administered indirectly by the county or vice versa. Cross-administration occurs when a given agency is receiving both county and discretionary funds and it would be too confusing to have them monitored separately. In other cases, the county may opt to do all or none of the SDPP monitoring in its area. For our samples, however, all the direct, discretionary-funded contracts are monitored by DFY with the county responsible for monitoring those contracts it has funded through SDPP county formula.

Monitoring by DFY

DFY guidelines for direct contracts require both an agency self-monitoring and a DFY on-site monitoring report. The provider agency's self-monitoring is a prelude to the DFY on-site monitoring visit which is to be done by the end of July so that the assessment and rating will be available for refunding decisions in the fall.

The forms for agency self-monitoring and DFY direct monitoring are the same. Each 17-page form contains both a fiscal and a program/administrative instrument. The fiscal monitoring instrument consists of a series of yes/no questions designed to assess compliance with DFY's standards for claiming and fiscal recordkeeping. The remaining program/administrative instrument, ten pages in length, covers standards related to service delivery, personnel, governance and administration.

The provider agency was to submit its self-monitoring report within 30 days of receipt of the forms. The regional DFY program management specialist then follows up with an on-site monitoring visit, using the same forms and procedures. The regional office then informs the agency of its findings. If areas of non-compliance were identified by either monitor an action plan was to be submitted identifying the problems and how they were going to be resolved and in what time frame.

Extent of Monitoring. Table 6 presents information on the extent and status of the monitoring for a sample of 1986 discretionary contracts. While agency self-monitoring reports were found for 77 percent of the programs, on-site monitoring reports were found for only 61 percent of the sampled programs. Monitoring reports were missing for almost two-thirds of the sample programs in New York City. After LCER staff informed DFY of this problem, DFY staff confirmed the situation and reported that they would implement corrective measures immediately. DFY's 1987 direct contract guidelines stipulate that the on-site monitoring instruments be kept in the file as an official document.

Table 6

DFY's Monitoring of LCER Sample
1986 Discretionary Contracts

DFY Region	Agency Self-Monitoring	DFY Monitoring	Monitoring Status: In Compliance	Monitoring Status: Not In Compliance	Monitoring Status: Unknown	(N=)
Central	88%	88%	63%	0%	37%	8
Eastern	72	89	72	0	28	18
Metro	75	75	50	0	50	8
NYC	72	37	32	0	68	71
Western	92	96	76	16	8	25
Statewide	77%	61%	49%	3%	48%	130

Source: LCER Sample Discretionary Contracts, July 1987.

Notification. Upon completion of the on-site visit, the provider agency is supposed to be notified in writing of its compliance or non-compliance with the contract and of any corrective actions that should be taken. In many cases, though, such a letter was not in the file. Thus, LCER staff listed the monitoring status as "unknown" if the letter was not in the file, if the monitoring report was missing or if the status could not be discerned from the monitoring report. The regions outside of New York City each monitored a greater proportion of their sample programs and, in general, presented more complete information regarding the monitoring and the follow-up action tracking plans. The Western Region was the only one to have specifically identified programs that were not in compliance.

Quality of Monitoring. Considerable variation was evident in the quality of DFY monitoring reports. One indication of this was the consistency and completeness of the monitors' reports. The form requires the monitor to fill in specific contract stipulations, to assess them in accord with DFY instructions, to present findings and to identify the basis for their findings such as interviews, review of records, or observation. LCER staff observed that the completed forms deviated from this standard. Instead of contract stipulations, there might be the simple phrase "see contract" or nothing at all. Checkmarks would be used, presumably to indicate compliance, with no basis for the finding. Such incompleteness suggests that the forms are not as useful as they could be.

A second indication is the extent to which problems were identified and followed up (see Table 7). Frequently, the reports identified administrative problems such as the failure to co-sign checks, to maintain staff time sheets, or to maintain adequate program records. In reviewing the files, it was difficult to tell whether the problem was a failure to meet contract requirements or to document them. In the Western Region, four programs were found to be out of compliance with the monitor citing the commingling of funds, unauthorized program changes or the agency's failure to meet contract stipulations.

Table 7

Results of DFY's Monitoring of LCER Sample
1986 Discretionary Contracts

DFY Region	In what percent of programs were problems... Identified	Followed-Up and Corrected	(N=)
Central	80%	60%	5
Eastern	31	23	13
Metro	50	50	4
NYC	39	22	23
Western	74	57	23
Statewide	53%	38%	68

Source: LCER Sample of Discretionary Contracts, July 1987.

Problems were followed up with action tracking forms identifying the problem, the recommendation, the action taken, and the date of implementation. Both DFY and the agency sign the form and DFY verifies that the actions have been implemented. Two programs in the Eastern Region were identifed as having serious problems--a significant change in program focus and failure to meet objectives. Although the programs were not specifically identified as out of compliance, monitors did follow-up with action tracking plans. The problem was considered corrected when there was verifying evidence in the file. Thus, some of the files contained action tracking forms but it was not always evident that the problems had been corrected. Generally, LCER staff observed that the monitoring was better in the regions outside New York City.

Impact of Monitoring. DFY and the county youth boards perceive their chief role to be the provision of technical assistance to these agencies. Thus far, even when monitors have uncovered non-compliance with contract provisions the response has been to suggest better recordkeeping, a revision of the contract provisions, or a revision of program objectives for future contracts.

Internal Audit. In addition to the routine monitoring, more complete program assessments are undertaken by DFY's Deputy Inspector General. In operation for approximately two years, this office has conducted eight audits of Special Delinquency Prevention Programs. Thus far, most have been of programs in New York City. The program is measured against DFY program and fiscal guidelines, SDPP standards, Comptroller's guidelines, and the contract. Findings and recommendations are made both to the provider and to DFY. The provider agency is given a chance to respond to the audit and must implement recommended actions. Of the eight audits thus far, only two agencies have failed to implement changes and have been placed on program and fiscal hold.

Monitoring by the Counties

Counties outside New York City can administer the county-funded programs or choose to let DFY administer them. All but 13 county youth bureaus administer some or all of their SDPP county contracts.

Counties can receive up to seven percent of SDPP county funds for administration. Several counties in the sample held contracts with outside agencies for administering their SDPP program; others conducted the monitoring with youth bureau staff. Each county uses its own monitoring form.

The extent and quality of the monitoring varied. A few sample counties had formal monitoring forms similar in content to DFY's, but LCER staff did not always find them in the files. In the sample counties, the definitions of monitoring ranged from constant contact with the agency and reliance on statistical reporting to the more formal monitoring assessments in Onondaga and Erie. In Nassau, which had a contract for monitoring, three of the sample contracts had not been monitored until three months after the end of the program year. Westchester was developing a uniform, computerized case record for each program registrant but the county had not conducted on-site visits of our sample contracts.

Basic program data such as numbers of clients served is gathered and reported very differently. In some cases, the agency reports data for each objective, in others the agency reports demographic information. Suffolk county gathers data on the target population as described in the SDPP guidelines.

Program Reports

According to SDPP proposal guidelines "monthly reports will be required as a way of monitoring the progress of the program, and ensuring that it is serving the intended youth population." This guideline, however, has been loosely enforced. Some agencies provide monthly reports, others quarterly. There were no such reports for 62 percent of our sample discretionary contracts. Only 13 percent provided ten or more reports. Further, there is no guideline or uniform format required of these reports. Thus, these reports cannot be used to ensure that the "intended youth population" is being served.

In the six counties visited, there was more reliance upon monthly or quarterly reporting. Some of the forms required specific statistical data while others were open-ended narratives. Again, among the counties visited, there was no uniformity with some requesting demographic data while others required reports of number served by objective.

Fiscal Procedures and Claims

SDPP programs receive advance financing from one-quarter to one-third of the total contract amount, depending upon the size of the total grant. Eighty-five percent of LCER's sample discretionary contracts received advances. In LCER's sample of providers, agencies were asked to rate the timeliness of SDPP advance funding as good, fair or poor. Seventy-seven percent of our sample providers rated it as good.

Methods of advance funding vary among the counties. Some counties contract with DFY to provide advance funding, other county contracts do not provide for advance funding but the county may elect to provide the advance.

Providers are to submit monthly claims vouchers by the 15th of the following month and program claiming is to be completed within three months of the end of the program year. With the development in 1986 of a computerized data base, tracking late submissions became easier. LCER's analysis of DFY claims submission and payment data for all 1986 SDPP contracts showed that providers submitted an average of seven claims during the program year. If not questioned, the claims were generally processed and paid within one month after receipt by DFY's regional office, as required.

Table 8 summarizes by region SDPP 1986 expenditure data. Ninety-four percent of SDPP funds were claimed as of the lapse date on September 15, 1987. This leaves a balance of $768,211 to be applied as savings to a future program year.

Table 8

1986 SDPP Expenditures Summarized by Region

	Discretionary		County		Total SDPP	
Region	Contract Amount	Amount Claimed	Contract Amount	Amount Claimed	Contract Amount	Amount Claimed
Central	$ 280,585	$ 250,634	$ 996,644	$ 945,757	$1,257,229	$1,196,391
Eastern	441,826	417,767	1,047,507	978,661	1,489,333	1,396,428
Metro	388,529	364,447	1,951,248	1,773,935	2,339,777	2,138,382
New York City	5,029,233	4,810,367	*	*	5,029,233	4,810,367
Western	1,337,490	1,248,383	1,750,179	1,645,078	3,087,669	2,893,461
Total	$7,457,663	$7,091,598	$5,745,578	$5,343,431	$13,203,241	$12,435,029

*Appropriation does not permit county funds to New York City.

Source: Data provided by Division for Youth, December 1987.

DFY also limited the number of budget amendments that will be allowed. Three budget amendments will be considered during the program year; an additional final amendment may be allowed following the external audit to allow close-out of the contract. Community organizations, subject to a number of changes in staffing and other expenses during the program year, would often delay requesting contract amendments until the end of the program year. Extensive processing of amendments at the end of the program year, prevented an accurate estimate of outstanding claims and expenses.

In August 1987, DFY published Fiscal Guidelines and Procedures for Direct Contract Programs. In addition to outlining DFY's guidelines, it is a bookkeeping manual for contract agencies. Although addressed specifically to the discretionary or direct contract agencies, the manual is available to counties should they wish to use the guidelines for their contracts.

Evaluation

In any effort to evaluate the effectiveness of prevention programs for youth, it is necessary for there to be explicit objectives upon which the assessment can be made. DFY recognizes this and, in their Manual for the Preparation of the Program Proposal Narrative clearly delineates how outcome objectives are to be written. Outcome objectives are "the guideposts upon which your program's success will be evaluated. They must be clear, realistic and measurable statements describing the intended results or outcomes of the program." For each objective agencies must describe how it will be evaluated including criteria for success, methods for data collection and analysis and provide a sample of evaluation instruments. "Measurement tools need not be elaborate or complex. They must be able to clearly measure the intended outcome of the objectives...Standardized tools are best, but self-designed tools can also be appropriate."[1]

But DFY has failed to follow through. LCER's examination of the sample contracts indicates great diversity in what was accepted. The section headed "Objectives" was often a narrative statement containing a mix of general goals, process objectives such as the number to be served, and outcome objectives which may or may not be measurable.

Further, DFY has not conducted any evaluations of SDPP contracts. Thus, although an evaluative mechanism appears to be in place, the process has been defeated either at the beginning with the acceptance of inappropriate objectives or at the end by a lack of follow through.

While recognizing the need for meaningful, ongoing program evaluation, DFY notes that

> any attempt to immediately implement true program evaluation at this point would be doomed to failure for two reasons: first, it would represent a radical departure from past practices, and secondly and relatedly, much preliminary preparation would not have been accomplished.[1]

Instead, the division is "attempting to progress towards evaluation."[2] This attempt has been a long-standing situation. LCER's 1980 audit which examined the first year of SDPP's operation, and a 1984 audit by the Office of State Comptroller both criticized the division for its failure to evaluate programs. In 1982, DFY reviewed a Taxonomy of Outcome Statements, Measures, and Data Collection Instruments and Methods For Prevention Programs Serving Youth developed by the Council on Children and Families. The purpose of the taxonomy was to provide agencies, policy makers, and evaluators access to a common set of program outcome statements, related outcome measures and suggested methods of data collection. According to the Council staff, this taxonomy was developed for small community-based agencies keeping in mind that evaluation can be a time-consuming and expensive venture for such agencies. Although commenting at the time that the taxonomy represented a potentially useful tool for program evaluators, DFY apparently let the matter drop and is now looking forward to the Council's current revision of this taxonomy.

In 1985-86, the Legislature adopted language which would have required DFY to evaluate the efficacy of these programs. However, the language was vetoed by the Governor.

Assessments of SDPP Administration

LCER surveyed county youth boards outside of New York City and sample providers for their assessments of SDPP administration. Ten aspects were rated from application processing to contract close-out. Because of their long association with DFY, county youth boards were asked to assess DFY's administration in 1986 and in the prior five-year period. As shown in Appendix B, six areas of DFY's administration were rated as good by more than half of the responding county youth bureaus. These areas included technical assistance, timely notification of award, fiscal and program monitoring, and timely quarterly payments. These same areas were rated as having improved within the past five years by over one-quarter of the respondents.

The two major problem areas were the timeliness of the application process, which was mentioned in the section on contract selection, and the budget amendment process. Respondents noted that the amendment process was too lengthy and that amendment approval was inconsistent.

The majority of discretionary-funded providers rated DFY's administration as good in all areas. The areas of some concern to both discretionary and county-funded providers were technical assistance and the amendment process.

One of the problems frequently mentioned was the need for additional funding. Some programs have been funded at the same level for several years. Regional and county staff commented on the frustration in rewarding "good" programs with the same level of funding the following year. Several providers suggested that more technical assistance be provided to help agencies transition onto other funding streams. In the Metro Region, there have been efforts made in this area. A teen pregnancy program in Westchester became eligible for funding by the Department of Social Services and this enabled the funding of a new SDPP program. While such an approach may not be appropriate for all programs, transitioning onto other funding streams could be considered as a technical assistance option.

Chapter Summary

- DFY has instituted a uniform monitoring system for its discretionary contracts. However, DFY has not established uniform monitoring requirements for the SDPP county contracts.

- DFY monitoring was more consistent and complete in the regions outside of New York City. Monitoring reports were missing for almost two-thirds of LCER's sample of discretionary programs in New York City. The lack of such reports brings DFY's subsequent refunding decisions into question.

- DFY has not specified a common format for SDPP reporting nor have they enforced the requirement for program reporting.

- DFY has implemented a computerized fiscal reporting system for SDPP and has established guidelines and procedures to cover direct contracts but not county contracts.

- DFY has not conducted any evaluations of SDPP programs despite the fact that applicants are required to provide evaluative indicators.

FOOTNOTES

I Introduction

1. Chapter 60, Laws of 1979, p. 208.
2. NYCRR 9, Subpart 165.2.

II Allocations and Contract Selection

1. Letter to LCER from DFY, January 30, 1987.
2. Ibid.

III Monitoring, Reporting and Evaluation

1. DFY, Manual for the Preparation of the Program Proposal Narrative, May 1984, p. 9.
2. Letter to LCER from DFY, December 4, 1987, pp. 2-3.
3. Ibid., p. 3.

APPENDIX A

SDPP DISCRETIONARY FUNDING FOR PROJECT YEARS 1983-87

Region/County	Contract Amounts 1983	1984	1985	1986	1987
Western					
Allegany	--	--	--	--	--
Cattaraugus	$10,000	$10,000	$10,000	$10,993	$10,993
Chautauqua	--	7,500	7,500	7,500	--
Chemung	10,000	10,000	10,000	10,000	10,000
Erie	1,045,451	1,128,517	959,219	991,589	997,656
Genesee	--	--	22,500	22,514	22,514
Livingston	--	--	--	--	--
Monroe	302,000	198,443	177,542	207,627	254,628
Niagara	26,000	26,000	26,000	26,000	40,883
Ontario	11,300	12,908	13,465	33,467	39,467
Orleans	17,000	28,000	20,000	20,000	20,378
Schuyler	--	--	--	--	--
Seneca	--	--	--	--	--
Steuben	--	--	10,200	8,800	23,558
Wayne	--	--	--	--	--
Wyoming	--	--	--	--	--
Yates	--	--	19,000	20,000	20,000
Western Total	1,421,751 (21.52%)	1,421,368 (19.73%)	1,275,426 (17.09%)	1,358,490 (18.16%)	1,440,077 (16.92%)
Central					
Broome	32,775	21,470	83,523	70,095	99,414
Cayuga	--	13,000	--	--	--
Chenango	--	--	--	--	--
Cortland	--	--	--	--	12,111
Delaware	--	--	--	--	--
Herkimer	15,000	15,000	14,000	13,000	14,000
Jefferson	--	--	--	--	--
Lewis	--	--	--	--	--
Madison	--	--	--	--	--
Oneida	55,500	43,500	41,500	82,500	104,656
Onondaga	127,979	129,000	93,000	86,000	91,000
Oswego	--	--	--	--	--
Otsego	10,000	10,000	10,000	9,000	10,900
St. Lawrence	--	--	--	--	--
Tioga	--	--	--	--	--
Tompkins	--	--	--	--	19,991
Central Total	241,254 (3.65%)	231,970 (3.22%)	242,023 (3.24%)	260,595 (3.48%)	352,072 (4.14%)

Region/County	Contract Amounts 1983	1984	1985	1986	1987
Eastern					
Albany	120,297	184,598	198,726	177,776	190,100
Clinton	15,500	5,000	5,000	--	--
Columbia	--	--	3,400	--	--
Dutchess	22,725	7,000	19,852	16,000	18,035
Essex	--	--	10,000	--	--
Franklin	15,000	40,000	52,500	52,000	53,500
Fulton	--	--	--	--	--
Greene	15,000	9,000	--	8,500	8,500
Hamilton	--	--	--	--	--
Montgomery	--	--	12,000	12,000	29,300
Orange	51,093	69,431	48,430	51,579	45,000
Rensselaer	22,703	22,703	17,000	21,000	23,000
Saratoga	10,000	14,000	11,500	10,921	15,500
Schenectady	45,900	50,900	37,075	32,050	23,750
Schoharie	--	--	--	--	--
Sullivan	--	--	--	5,000	5,000
Ulster	16,200	19,200	40,000	38,000	45,000
Warren	7,700	7,700	7,700	17,000	33,500
Washington	--	--	--	--	--
Eastern Total	342,118	429,532	463,183	441,826	490,185
	(5.18%)	(5.96%)	(6.20%)	(5.91%)	(5.76%)
Metro					
Nassau	77,000	35,000	105,000	109,000	100,000
Putnam	--	28,320	32,394	33,000	40,000
Rockland	19,000	--	18,624	30,000	55,000
Suffolk	100,000	94,900	121,529	156,529	187,000
Westchester	64,116	35,950	38,000	60,000	45,000
Metro Total	260,116	194,170	315,547	388,529	427,000
	(3.93%)	(2.69%)	(4.23%)	(5.20%)	(5.01%)
New York City					
Bronx	843,701	866,540	891,964	990,875	1,070,875
Kings	1,483,271	1,673,872	1,737,701	1,639,448	1,916,300
Manhattan	1,351,775	1,686,524	1,792,566	1,577,235	1,999,757
Queens	589,839	622,045	651,575	726,905	708,280
Richmond	74,250	79,250	94,778	94,778	108,778
NYC Total	4,342,836	4,928,231	5,168,584	5,029,241	5,803,990
	(65.72%)	(68.40%)	(69.24%)	(67.25%)	(68.17%)
Grand Total	$6,608,075	$7,205,271	$7,464,763	$7,478,681	$8,513,324
	(100.00%)	(100.00%)	(100.00%)	(100.00%)	(100.00%)

Source: Data provided by the Division for Youth, February 1987.

APPENDIX B

ASSESSMENTS OF SDPP ADMINISTRATION

Table B-1

Assessment of SDDP Administration
by County Youth Bureaus

	During 1986					Over the Past Five Years				
Administrative Phase	Good	Fair	Poor	Not Applicable	Blank	Improved	Stable	Worsened	Not Applicable	Don't Know*
Assistance in Preparing Application	53.2%	19.2%	8.5%	14.9%	4.3%	36.2%	38.3%	6.4%	8.5%	10.6%
Timely Application Process	48.9	31.9	14.9	-	4.3	23.4	45.8	19.2	2.1	8.5
Timely Notification of Award	55.3	31.9	8.5	-	4.3	25.5	61.7	4.3	-	8.5
Timely Advance Payment	31.9	12.8	6.4	44.7	4.3	21.3	31.9	4.3	31.9	10.6
Monitoring of Expenditures	72.3	19.2	2.1	2.1	4.3	34.0	51.1	-	2.1	12.8
Monitoring of Activities	53.2	19.2	8.5	12.8	6.4	25.5	40.4	12.8	6.4	14.9
Timely Quarterly Payments	55.3	14.9	2.1	17.0	10.6	25.5	44.7	-	14.9	14.9
Provision of Technical Assistance	70.2	17.0	6.4	2.1	4.3	38.3	44.7	2.1	2.1	12.8
Amendment Process	38.3	27.7	25.5	2.1	6.4	17.0	42.6	29.8	-	10.6
Close-out Procedures	36.2	27.7	8.5	14.9	12.8	14.9	48.9	4.3	12.8	19.1

*Also includes blank responses.

Source: LCER's Survey of County Youth Boards outside NYC, July 1987.

Table B-2

Assessment of SDPP Administration
by LCER 1986 Sample
Discretionary-Funded Providers

Administrative Phase	Division For Youth				County Youth Bureau			
	Good	Fair	Poor	Not Applicable	Good	Fair	Poor	Not Applicable
Discretionary-Funded Providers:								
Assistance in Preparing Application	66.7%	15.9%	2.9%	14.5%	18.8%	5.8%	-	75.4%
Timely Application Process	62.3	15.9	13.0	8.7	17.4	1.5	7.3%	72.5
Timely Notification of Award	60.9	18.8	8.7	11.6	13.0	4.4	7.3	75.4
Timely Advance Payment	62.3	17.4	5.8	14.5	10.1	5.8	1.5	81.2
Monitoring of Expenditures	75.4	11.6	-	13.0	13.0	8.7	-	78.3
Monitoring of Activities	68.1	17.4	1.5	11.6	17.4	7.3	-	75.4
Timely Quarterly Payments	58.0	7.3	7.3	27.5	11.6	8.7	-	79.7
Provision of Technical Assistance	56.5	24.6	5.8	13.0	13.0	10.1	1.5	73.9
Amendment Process	59.4	18.8	5.8	15.9	11.6	10.1	1.5	75.4
Close-out Procedures	69.6	13.0	4.4	13.0	15.9	4.4	1.5	76.8

Table B-3

Assessment of SDPP Administration
by LCER 1986 Sample
County-Funded Providers

Administrative Phase County Funded Providers:	Division For Youth				County Youth Bureau			
	Good	Fair	Poor	Not Applicable	Good	Fair	Poor	Not Applicable
Assistance in Preparing Application	28.6%	-	-	71.4%	92.9%	7.1%	-	-
Timely Application Process	14.3	7.1%	-	78.6	92.9	7.1	-	-
Timely Notification of Award	14.3	-	-	85.7	100.0	-	-	-
Timely Advance Payment	14.3	-	-	85.7	50.0	28.6	-	21.4%
Monitoring of Expenditures	28.6	-	-	71.4	100.0	-	-	-
Monitoring of Activities	21.4	-	-	78.6	85.7	14.3	-	-
Timely Quarterly Payments	14.3	-	-	85.7	50.0	21.4	-	28.6
Provision of Technical Assistance	21.4	-	-	78.6	85.7	14.3	-	-
Amendment Process	21.4	-	-	71.4	78.6	14.3	7.1%	-
Close-out Procedures	21.4	-	-	78.6	85.7	7.1	-	7.1

APPENDIX C AGENCY RESPONSE

NEW YORK STATE EXECUTIVE DEPARTMENT
DIVISION FOR YOUTH
84 HOLLAND AVENUE
ALBANY, NEW YORK 12208

LEONARD G. DUNSTON
DIRECTOR

LES GOLDBERG
EXECUTIVE DEPUTY DIRECTOR

March 29, 1988

Mr. James J. Haag
Acting Director
State of New York
Legislative Commission on Expenditure
Review
111 Washington Avenue
Albany, New York 12210-2277

Dear Mr. Haag:

I have reviewed the Commission's Draft Audit Report concerning the Division's Special Delinquency Prevention Program.

We are pleased that you found that the Division has improved its management procedures. The Division acknowledges that further refinements should be made to achieve full compliance with the audit's recommendations as evidenced by the attached comments.

We are appreciative of your constructive suggestions and recommendations for improving our program effort.

If you wish to discuss this matter further, please contact me.

Sincerely,

Leonard G. Dunston

New York State Executive Department
Division for Youth
Preliminary Audit Report Response
Special Delinquency Prevention Program

GENERAL COMMENTS

Prior to responding to the specific recommendations contained in the report the Division would like to make the following general comments:

"DFY states that its discretionary funds are distributed on the basis o 'need' formulas. LCER found, however, that DFY can and does adjust thes funds by 1) allocating funds regionally, 2) using prior year's unexpende funds, and 3) designating city-wide programs. The impact of these ad justments has been to increase funding to New York City, particularly in th Borough of Manhattan.

During the past three years, DFY has gone to considerable lengths to buil rationality into the statewide allocation of the SDPP funds, while actin within the constraints of the appropriation and legislative intent. Durin this time, the Division has sought advice and guidance from numerou sources, including social scientists, demographers and research evaluators The goal was to design and develop an allocation methodology based o reasonableness and objectivity. In our collective efforts to determine more appropriate distribution of funds, (the legislation mandates targete formulas only, i.e., one half of the discretionary portion of funds i directed to New York City and Buffalo and does not address how the remainin funds are to be allocated), we agreed that because of the appropriatio language as well as the application of DCJS formula, it was difficult t determine an alternate objective strategy for statewide allocations.

The auditors also noted that "some variable used to develop the juvenil justice need percentages are not collected and reported at the borou level, DFY developed its own formula for distributing funds within New Yor City. The City formula was derived from the 1980 census data and differe from the juvenile justice formula since it did not include more specifi criminal and juvenile justice indicators cited previously." The repor further indicates that, "LCER staff asked DCJS and the Council on Childre and Families personnel responsible for the development of the juvenil justice formula to comment on the variables used in the New York Cit formula. While neither could comment on the impact, both did note that th juvenile justice formula targets "youth at risk, and characterized th variables used by DFY as more general indicators of 'families in chaos'."

It should also be noted that:

1. The DCJS formula is used for all Statewide discretionary distribution o SDPP funds, including New York City, which represents 56.62% of th discretionary funds. As such, youth who may be identified by DCJS an the Council on Children and Families as "at risk" would be subsume under the SDPP funds distribution, since the formula used is the same a

DCJS and the Council on Children and Families developed and used for identifying youth at risk.

2. The auditors also stated that "some variables used to develop the juvenile justice need percentages are not collected and reported at the borough level."

As such, the Division was faced with the problem of how to sub-divide the 56.62% of the DCJS allocation among the five boroughs. Again, as in all respects, the Division sought advice and guidance from internal and external social scientists, demographers and research evaluators. Each recommended the use of nationally recognized demographic information that closely correlated to the variables and indicators for increased delinquent behavior within risk of communities. As such, the Division used the most recent census (1980) that, as noted in the audit report, examined:

- Percent of single-headed households with children
- High school dropout rate
- Percent of households receiving public assistance
- Percent of families with income below the poverty level
- Percent of labor force unemployed.

While the DCJS formula addresses the number of youth who can be targeted as at-risk, the census information identifies the conditions that cause such behavior. While the audit report notes that the use of census variables indicate "families in chaos" and not "youth at risk," the Division supports the documented research that draws a high correlation between families in chaos and youth delinquent behavior. Regardless of the derivatives of "need indicators," the Division's use of the census information to objectively sub-divide the five New York City Counties (boroughs) (as based on the statewide DCJS formula) was done to ensure that communities at risk received SDPP allocations.

It is important to note that neither the DCJS nor census tract information are legislative mandates. However, the Division in its search for rationality used this information to model and direct its statewide allocation of funds.

RESPONSE TO RECOMMENDATIONS

Recommendation

"DFY should insure that program objectives and evaluation indicators are adequate for program assessment."

Response

During the period cited by the audit, the Division had indeed identified shortcomings in the statements of objectives and evaluation indicators and program assessments activities. During that period of time, the Division was taking steps to put in place a system that would move us toward remedying the problems that were identified. Beginning with 1988, on a much broader scale than heretofore implemented, the Division will have in place, systems to evaluate the benefits of the programs that it is funding relative to the objectives that are stated. The Division will in part, use this information to determine whether or not programs should be funded in the future. The Division anticipates having initial implementation of this system underway shortly.

The Division has centralized the development and administration of standards governing the program application process. Intensive staff training will be provided so that the new Community Management Specialists will be able to provide technical assistance to youth bureaus and program providers to ensure that program objectives and evaluation indicators are adequate for program assessment.

The Deputy's Office will ensure through quality assurance activities that standards are defined and met and that program objectives and evaluation indicators are adequate for program assessment.

Recommendation

"Since the majority of SDPP contracts are renewals and the application process is paperwork intensive and takes about four months, DFY might wish to consider converting to a multi-year application process."

Response

The Division, through its Office of Local Services, has created a task group to further study the feasibility of multi-year application and contracting for SDPP and other DFY programs.

Recommendation

"The extent and quality of monitoring needs to be improved, especially in New York City."

Response

The Division agrees and will begin implementing the following:

- The management of the New York City Local Services field operations, including monitoring, will be centralized within the newly established Bureau of Community Management Services thus providing greater control and accountability with respect to monitoring activities.

- The dual role of Program Management Specialists (field staff) who traditionally were charged with developing and overseeing programs while simultaneously monitoring those same programs, will now be changed. The functions of program and contract development are expected to be assigned to staff distinct and separate from staff charged with monitoring, auditing, and assessment activities.

- A single monitoring instrument will be developed to replace the existing self-monitoring and field monitoring instruments which will reduce clerical, transcription and staff errors.

From a historical perspective, in order to provide guidance and direction for monitoring activities of the SDPP program, we note that the Division has imposed standards for youth bureaus monitoring funded programs; developed a uniform instrument to standardize the Division's monitoring of the youth bureaus; (Sections of these standards and the monitoring instrument are devoted to SDPP contracts specifically), and in preparation for the 1987 direct SDPP contracts, conducted regional training for all program management staff in order to standardize monitoring activities across the State.

Recommendation

"DFY should not only evaluate existing programs but should also promote effective models of delinquency prevention."

Response

The Division has begun to build a foundation upon which the following would occur:

- The development of a system for SDPP concept and program application which include statements of program objectives and performance indicators.

- The development of technical assistance materials that include: a program proposal manual; proposal guidelines; a guide to completing the SDPP-B application; an SDPP manual in order to inform the Division for Youth staff about the SDPP administration process, as well as to provide technical assistance to agencies who apply for and receive SDPP funds; fiscal guidelines and procedures for direct contract programs which provide the basis for an evaluation system.

- A monitoring system that includes a self-reporting phase, a field monitoring phase, as well as an in-depth assessment (audit).

- Standardization of contract forms, program applications, resource allocation and approvals, and performance indicators.

- The development of a philosophical framework that is based upon delinquency causation theories. Once established, this framework may facilitate the refinement of evaluation activities, and inform the development of program models.

The Division has, through recent program development efforts, redefined the role of our field staff. A Community Management Specialist will be responsible for the planning, contract and local program development, as well as the Division's liaison with youth bureaus, community-based organizations, and other youth services providers. The Community Management Specialist will be charged with the responsibility to ensure that appropriate evaluative indicators are included in SDPP applications

A second distinct field staff role is that of the "Contract Compliance Specialist." This staff will be responsible to implement the Division's monitoring, auditing, and evaluation functions. We expect that the Contract Compliance Specialist will collectively provide the necessary information to enhance program development and refinement as well as inform policy formulation and direction by their monitoring, auditing and evaluation activities.

Thank you for the opportunity to respond to the Findings and Recommendations contained in the audit report.

PROGRAM AUDITS* OF THE LEGISLATIVE COMMISSION ON EXPENDITURE REVIEW

Pupils With Special Educational Needs, April 30, 1982.*

State Division of Probation Programs, June 10, 1982.

State Physician Shortage-Maldistribution Programs, July 16, 1982.*

Commission on Cable Television, September 15, 1982.

Management of Youth Rehabilitation Programs, October 29, 1982.

Impact of Youth Rehabilitation Programs *(Research Report),* October 29, 1982.

Council on the Arts Application Review and Funding, November 29, 1982.

The Weatherization Assistance Program, December 6, 1982.

SUNY Hospitals, February 28, 1983.

Dormitory Vandalism on SUNY Campuses, March 24, 1983.

Procurement of Consulting Services, March 31, 1983.*

Processing of Human Rights Cases, April 25, 1983.

Contractual Social Services Training Programs, June 3, 1983.

Comparative Resident and Non-Resident Tuitions, Enrollments and Policies in the Fifty States, June 7, 1983.

State Operated Ski Centers, September 30, 1983.

Mental Health Community Support System, October 28, 1983.

Education of Children Under State Care or Custody, November 30, 1983.

State Insurance Fund, December 9, 1983.

State Alcoholism Treatment Centers, December 14, 1983.

Correctional Officer Training Program, February 15, 1984.

Neighborhood Preservation Program, March 1, 1984.

Unemployment Insurance Benefit Payment Control, March 9, 1984.*

Family Court Orders for Handicapped Children, March 9, 1984.*

Bridge Rehabilitation and Replacement, April 9, 1984.

Weatherization Assistance Program Follow-Up, April 20, 1984.

The Mental Health Information Services, May 21, 1984.

Disaster Preparedness Programs, June 15, 1984.

State Prison Release Programs, June 30, 1984.

Home Insulation and Energy Conservation Program, September 21, 1984.

Power Authority of the State of New York, November 30, 1984.

State Equine Drug Testing and Research, December 31, 1984.

Local Social Services Administrative Costs, January 31, 1985.

OMRDD Information System Needs, March 15, 1985.

Screening of Public School Children, April 12, 1985.

State Milk Dealer Licensure and Regulation, April 19, 1985.

Control of State Employee Health Insurance Costs, April 30, 1985.

Preservation of Historic Resources, May 17, 1985.

West Valley Nuclear Waste Management Demonstration Project, May 24, 1985.

Surplus Real Property Programs, June 7, 1985.

Leasing Of State Agency Space, June 13, 1985.

CUNY/SUNY Building Repair and Equipment Replacement, June 25, 1985.

Mitchell-Lama Housing Mortgage Delinquencies, August 15, 1985.

Environmental Quality Bond Act of 1972 Solid Waste Management Programs, December 18, 1985.

OMRDD Monitoring of Day Treatment Programs, December 24, 1985.

SUNY CUNY Energy Management Programs, January 31, 1986.

State Commission of Correction Programs, February 28, 1986.

Federal-Rural Transportation Assistance, March 7, 1986.

SUNY Educational Opportunity Program, April 25, 1986.

State Day Care Centers, April 25, 1986.

Capital Funds for Developmental and Psychiatric Centers, April 30, 1986.

Crime Victims Board Programs, May 18, 1986.

Environmental Quality Bond Act of 1972 Land Acquisitions, June 6, 1986.

Environmental Quality Bond Act of 1972 Water Quality Improvement Projects, June 12, 1986.

Environmental Quality Bond Act of 1972 Air Quality Improvement Projects, June 20, 1986.

Local Police Training, August 15, 1986.

Alcohol and Substance Abuse Prevention Programs, September 15, 1986.

State Administration of New York City Rent Regulation, December 12, 1986.

Employee Ownership Assistance Act, December 16, 1986.

Mapping of State Freshwater Wetlands, December 19, 1986.

State Social Services Department Income Maintenance Forecasting, February 23, 1987.

Higher Education Opportunity Program, February 18, 1987.

State Telecommunications, March 23, 1987.

State Child Abuse & Maltreatment Register, Child Abuse Hotline, March 23, 1987.

A Comparison of State Government Initiatives for Scientific Research and Advanced Technology in New York and Pennsylvania *(Research Report),* March 30, 1987.

Community College Business and Technical Aid, April 30, 1987.

Status Report On OMRDD Information System Development, May 8, 1987.

Urban Development Corporation High Risk Targeted Investment Program, May 9, 1987.

Tax Stabilization Reserve Fund *(Research Report),* May 20, 1987.

Relocation Of State Offices From the World Trade Center, May 2, 1987.

Human Rights Caseload, June 1, 1987.

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Note: Excludes 95 reports printed 1971 through 1981. A list of these publications may be obtained by request of the Commission.

*Out of print; loan copies available upon request.

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